

## **U.S.** Department of Justice

United States Attorney's Office Southern District of Texas

1000 Louisiana Suite 2300 Houston, Texas 77002 Phone: (713) 567-9000 Fax: (713) 718-3300

February 25, 2021

Honorable George C. Hanks, Jr. United States District Court Southern District of Texas

Re: Status of cause no. 4:19-CR-832; United States v. Gerald M. Goines, et. al.

Judge Hanks:

The United States, Gerald Goines, and Steven Bryant jointly propose the Court set a status hearing date for Tuesday, June 1, 2021. As for the third defendant, Patricia Garcia, the parties all have agreed to her rearraignment, scheduled for March 9, 2021 at 9:30 a.m.

When the parties last appeared before the Court on March 3, 2020, it was prior to the institution of COVID-19 related stay-at-home orders in Texas. Since then, the COVID-19 pandemic has placed restrictions on all the parties and has affected the ability of each party to review discovery, meet with witnesses and clients, engage in case-related discussions with opposing counsel, and prepare for trial. Almost a year into the pandemic and its restrictions, and there are still uncertainties as to when and how the above restrictions will lessen. In addition, discovery is still ongoing.

Finally, because of the case's complexities, the parties respectfully request the Court set a status conference under 18 U.S.C. § 3161(h)(7)(B)(i) & (ii) for Tuesday, June 1, 2021, at which time the parties are hopeful they will be in a better position to propose dates for motions deadlines, pretrial conference and trial.

Respectfully submitted,

/s/Arthur R. Jones
Arthur R. Jones
Assistant United States Attorney
Southern District of Texas

/s/Alamdar S. Hamdani
Alamdar S. Hamdani
Assistant United States Attorney
Southern District of Texas

## /s/Nicole DeBorde

Nicole DeBorde Counsel for Gerald Goines

/s/Andy Drumheller
Andy Drumheller
Counsel for Steven Bryant

/s/Marjorie A. Myers
Marjorie A. Myers
Counsel for Patricia Garcia